

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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Criminal No. 05-10001-WGY

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UNITED STATES

v.

GREGORY WRIGHT

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**MOTION TO COMPEL GOVERNMENT TO  
PRODUCE DOCUMENTS REGARDING  
BOSTON POLICE OFFICER GREGORY BROWN**

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The defendant Gregory Wright, by his counsel, moves that the Court order the government to furnish his counsel with all documents it obtained from the Boston Police Department regarding Officer Gregory Brown. Undersigned counsel received a telephone call from Assistant U.S. Attorney Nadine Pellegrini at 11 a.m. today stating that the Court had denied a motion for a protective order it filed yesterday. The information it sought to conceal is that Officer Brown entered into a settlement agreement with the Boston Police Department on January 10, 2002 regarding an inaccurate detail card. Apparently, there is evidence that Officer Brown arrived at a paid detail late and yet a detail card was submitted that did not disclose that he arrived late. Apparently officer Brown denies doing anything intentionally wrong. The prosecutor stated that she had obtained the settlement agreement, a copy of the detail card, some letters, a report and an interview. Undersigned

counsel requested a copy of those documents. The prosecutor declined to provide them.

Officer Brown will be one of two government witnesses at the suppression hearing. He is the author of the police report, and testified at the state grand jury. He is the officer whom ATF agent Rudnicki interviewed to get the details of the incident. In short, he is a key government witness. The defendant is entitled to this information in order to cross-examine officer Brown. This information is discoverable under Local Rules 116.2(B)(1)(b), (B)(2)(a), (B)(2)(e), and (B)(2)(f). The defendant should have access to the documents so that he can cross-examine officer Brown, and so that he can have documents with which to cross-examine officer Brown.

Respectfully submitted,  
**GREGORY WRIGHT**  
By his attorney,

/s/

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